

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

ERIC MENDEZ, individually and on behalf
of all others similarly situated,

Case No. 3:15-cv-02077-AJB-JLB

CLASS ACTION

V.

PRICE SELF STORAGE MANAGEMENT
INC., and JOHN DOES 1-10,

**DECLARATION OF KAREN ROGAN
RE: NOTICE PROCEDURES**

Defendants.

I, KAREN ROGAN declare:

1. I am senior consultant at Kurtzman Carson Consultants LLC ("KCC"). I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. KCC was retained by the parties to serve as the Claims Administrator to, among other tasks, mail the Class Action Settlement Notice Form (the “Notice”) and Class Action Settlement Claim Form (the “Claim Form”); receive and process Claim Forms, respond to Class Member inquiries; to establish and maintain a settlement website and perform other duties as specified in the Stipulation of Settlement (the “Stipulation”) preliminarily approved by this Court on May 13, 2016.

CAFA Notification. On May 27, 2016, in compliance with the Class Action Fairness Act (“CAFA”), 28 U.S.C. Section 1715, KCC mailed via United States Postal Service Priority Mail a cover letter to the U.S. Attorneys General and the Attorney Generals for all 50 states, along with a CD-ROM containing the following documents: 1) *Class Action Complaint*; 2) *First Amended Class Action Complaint*; 3) *Order Granting Preliminary Approval to Class Action Settlement and Approving Notice Plan*; 4) *Notice of Motion and Motion for Preliminary Approval of Class Action Settlement Agreement*; 5) *Memorandum*

1 *of Points and Authorities in Support of Plaintiff's Motion for Preliminary Approval of Class Action*
2 *Settlement Agreement; 6) Declaration of Attorney Steven Woodrow in Support of Preliminary Approval*
3 *of Class Action Settlement Agreement; 7) Class Notice; 8) Claim Form; and 9) Stipulation of*
4 *Settlement.* Copies of the cover letter and the mailing list for the CAFA notice are attached hereto as
5 Exhibit A.

6 3. **Mailed Notice.** On May 19, 2016, the Defendant provided KCC with a list of 315
7 persons identified as the Class Member List, i.e. all persons who: (a) received at least one text message
8 or call on their cellular telephone from Price Self Storage ("PSS"); (b) who responded to the text
9 message with the response STOP or revoked consent orally; and (c) who received a least one additional
10 text message from PSS apart from any message confirming the STOP request. KCC entered the Class
11 Member List information into its proprietary database and prepared a data file for the initial mailing.
12 Prior to mailing, KCC caused the addresses in the Class Member List to be updated using the National
13 Change of Address database ("NCOA") maintained by the U.S. Postal Service. A total of 40 addresses
14 were found and updated. There were still 41 records in the data that did not have complete addresses.
15 These 41 records were submitted for a reverse phone search based on the cell phone number. An
16 additional 18 addresses resulted from the reverse phone search.

17 4. On June 10. 2016, KCC mailed the Notice and Claim Form (collectively, "the Notice
18 Package") to each of the 293 persons on the Class Member List that had an address. A sample of the
19 Notice Package is attached hereto as Exhibit B.

20 5. As of August 4, 2016, KCC has received a total of two Notice Packages returned by the
21 U.S. Postal Service with forwarding addresses. KCC caused the Class Member list to be updated with
22 the new addresses and Notice Packages to be re-mailed to the updated addresses. As of August 4, 2016,
23 KCC has received a total of 73 Notice Packages returned by the U.S. Postal Service without forwarding
24 address information. KCC conducted address searches using credit and other public source databases to
25 attempt to locate new addresses for all of these Class Members. As of August 4, 2016, these searches
26 have resulted in 43 updated addresses. KCC promptly re-mailed Notices Packages to the updated
27 addresses.

28 6. **Toll-Free Telephone Number.** On or before June 10, 2016, KCC established a toll-free

1 telephone number dedicated to answering telephone inquiries from Class Members. As of August 4,
2 2016, KCC has received a total of 7 calls.

3 7. **Website**. On or before June 10, 2016, KCC also established a website
4 (www.PriceStoreTCPAClaim.com) dedicated to this settlement to provide additional information to the
5 Class Members and to answer frequently asked questions. Visitors of the website can download a
6 Notice, a Claim Form, the Stipulation of Settlement, the Order Granting Preliminary Approval to Class
7 Action Settlement and Approving Notice Plan, the Notice of Motion and Motion for Preliminary
8 Approval of Class Action Settlement Agreement, the Joint Stipulated Notice of Amended Notice Forms,
9 and the Memorandum of Points and Authorities in Support of Plaintiff's Motion for Preliminary
10 Approval of Class Action Settlement Agreement. Visitors can also submit claims online. The web
11 address was set forth in the Notice and the Claim Form. As of August 4, 2016, the website has received
12 83 unique visits.

13 8. **Requests for Exclusion.** The deadline for Class Members to request to be excluded from
14 the class was a postmarked deadline of July 14, 2016. As of the date of this declaration, KCC has
15 received no requests for exclusion.

16 9. **Objections to the Settlement.** The deadline for Class Members to object to the
17 Settlement was a postmarked deadline of July 14, 2016. As of the date of this declaration, KCC has
18 received no objections to the settlement.

19 10. **Claim Forms.** The deadline for Class Members to file a claim is a postmarked deadline
20 of September 21, 2016. As of the date of this declaration, KCC has received 60 claim forms.

21 11. Based on KCC's experience, including cases that were similar in scope, the notice
22 campaign comported with due process.

24 I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing is true
25 and correct to the best of my knowledge. Executed on this 4th day of August 2016 at San Rafael,
26 California. *[Signature]*

Karen Rogan

Karen Rogan

Exhibit A



3301 Kerner Boulevard
San Rafael, CA 94901

415.798.5900 PHONE
415.892.7354 FAX
kccllc.com

May 27, 2016

VIA PRIORITY MAIL

«First» «Last»
«Company»
«Address_1»
«Address_2»
«City», «State» «Zip»

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear «First» «Last»:

KCC CLASS ACTION SERVICES LLC is the independent third-party administrator in a putative class action lawsuit entitled *Eric Mendez, individually and on behalf of all others similarly situated, v. Price Self Storage Management Inc., and John Does 1-10*, Case No. 3:15-cv-02077-AJB-JLB. Troutman Sander LLP represents Price Self Storage Holdings, LLC (“Price”) in this matter. The lawsuit is pending before the Honorable Anthony J. Battaglia in the United States District Court for the Southern District of California. This letter is to advise you that Plaintiff filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit and the Court issued its Order granting preliminary approval on May 13, 2016.

Case Name: *Eric Mendez v. Price Self Storage Management Inc., et al.*

Case Number: 3:15-cv-02077-AJB-JLB

Jurisdiction: United States District Court,
Southern District of California

Date Settlement

Approved by Court: May 13, 2016

Price denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the following documents referenced below are included on the CD that is enclosed with this letter:



«First» «Last»
May 27, 2016
Page 2

1. **28 U.S.C. § 1715(b)(1) – Complaint and Related Materials:** Copies of the *Class Action Complaint* and *First Amended Class Action Complaint* are included on the enclosed CD Rom.
2. **28 U.S.C. § 1715(b)(2) – Notice of Any Scheduled Judicial Hearing:** Pursuant to the Court's *Order Granting Preliminary Approval to Class Action Settlement and Approving Notice Plan*, the Court has scheduled a final fairness hearing for August 22, 2016 at 3:00 p.m. in Courtroom 3B on the 3rd Floor of the Edward J. Schwartz United States Courthouse, 221 West Broadway, San Diego California 92101. Copies of the *Order Granting Preliminary Approval to Class Action Settlement and Approving Notice Plan*, *Notice of Motion and Motion for Preliminary Approval of Class Action Settlement Agreement*, *Memorandum of Points and Authorities in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement Agreement*, and *Declaration of Attorney Steven Woodrow in Support of Preliminary Approval of Class Action Settlement Agreement* are included on the enclosed CD Rom.
3. **28 U.S.C. § 1715(b)(3) – Notification to Class Members:** Copies of the *Class Notice* and *Claim Form* to be provided to the class is included on the enclosed CD Rom.
4. **28 U.S.C. § 1715(b)(4) – Class Action Settlement Agreement:** A copy of the *Stipulation of Settlement* ("Settlement Agreement") is included on the enclosed CD Rom.
5. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreement:** As of May 27, 2016, no other settlement or agreement has been entered into by the parties to this Action.
6. **28 U.S.C. § 1715(b)(6) – Final Judgment:** No Final Judgment has been reached as of May 27, 2016, nor have any Notices of Dismissal been granted at this time.
7. **28 U.S.C. § 1715(b)(7)(A)-(B) – Names of Class Members/Estimate of Class Members:** While Price is in the process of gathering information on this issue, pursuant to 28 U.S.C. § 1715(b)(7)(A), at this time a complete list of names of class members as well as each State of residence is not available, because the parties do not presently know the names or current addresses of all the proposed settlement class members and will not learn this information until the Settlement is preliminarily approved and the Court authorizes dissemination of information about the Settlement through the Class Notice. KCC is actively conducting reverse phone number searches in an attempt to identify class members. Pursuant to 28 U.S.C. § 1715(b)(7)(B), it is estimated that there are approximately 315 individuals in the class.
8. **28 U.S.C. § 1715(b)(8) – Judicial Opinions Related to the Settlement:** As the proposed Settlement is still pending final approval by the Court, there are no other opinions available at this time. As of May 27, 2016, there has been no written judicial opinion related to the settlement.



«First» «Last»

May 27, 2016

Page 3

If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact Troutman Sanders LLP at either (804) 697-1200 or virginia.flynn@troutmansanders.com immediately so that Price can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/

Patrick M. Passarella
Senior Vice President

Enclosure – CD Rom

Last	First	Company	Address 1	Address 2	City	State	Zip
Richards	Craig W.	Office of the Alaska Attorney General	P.O. Box 110300		Juneau	AK	99811-0300
Strange	Luther	Office of the Alabama Attorney General	501 Washington Avenue	PO Box 300152	Montgomery	AL	36130-0152
Rutledge	Leslie	Arkansas Attorney General Office	323 Center Street, Suite 200		Little Rock	AR	72201-2610
Brnovich	Mark	Office of the Arizona Attorney General	1275 W. Washington Street		Phoenix	AZ	85007
	CAFA Coordinator	Office of the Attorney General	Consumer Law Section	455 Golden Gate Ave., Suite 11000	San Francisco	CA	94102
Coffman	Cynthia	Office of the Colorado Attorney General	Ralph L. Carr Colorado Judicial Center	1300 Broadway, 10th Floor	Denver	CO	80203
Jepsen	George	State of Connecticut Attorney General's Office	55 Elm Street		Hartford	CT	6106
Racine	Karl A.	District of Columbia Attorney General	441 4th Street, NW, Suite 1100S		Washington	DC	20001
Lynch	Loretta E.	Attorney General of the United States	United States Department of Justice	950 Pennsylvania Avenue, NW	Washington	DC	20530-0001
Denn	Matt	Delaware Attorney General	Carvel State Office Building	820 N. French Street	Wilmington	DE	19801
Bondi	Pam	Office of the Attorney General of Florida	The Capitol, PL-01		Tallahassee	FL	32399-1050
Olens	Sam	Office of the Georgia Attorney General	40 Capitol Square, SW		Atlanta	GA	30334-1300
Chin	Douglas S.	Office of the Hawaii Attorney General	425 Queen Street		Honolulu	HI	96813
Miller	Tom	Iowa Attorney General	Hoover State Office Building	1305 E. Walnut Street	Des Moines	IA	50319
Wasden	Lawrence	State of Idaho Attorney General's Office	Statehouse	700 W Jefferson St	Boise	ID	83720-0010
Madigan	Lisa	Illinois Attorney General	James R. Thompson Center	100 W. Randolph Street	Chicago	IL	60601
Zoeller	Greg	Indiana Attorney General's Office	Indiana Government Center South	302 West Washington Street, 5th Floor	Indianapolis	IN	46204
Schmidt	Derek	Kansas Attorney General	120 S.W. 10th Ave., 2nd Floor		Topeka	KS	66612-1597
Conway	Jack	Office of the Kentucky Attorney General	700 Capitol Ave	Capitol Building, Suite 118	Frankfort	KY	40601
Caldwell	James D.	Office of the Louisiana Attorney General	P.O. Box 94095		Baton Rouge	LA	70804-4095
Healey	Maura	Office of the Attorney General of Massachusetts	1 Ashburton Place		Boston	MA	02108-1518
Frosh	Brian	Office of the Maryland Attorney General	200 St. Paul Place		Baltimore	MD	21202-2202
Mills	Janet	Office of the Maine Attorney General	State House Station 6		Augusta	ME	04333
Schuette	Bill	Office of the Michigan Attorney General	P.O. Box 30212	525 W. Ottawa Street	Lansing	MI	48909-0212
Lori Swanson	Attorney General	Attention: CAFA Coordinator	1400 Bremer Tower	445 Minnesota Street	St. Paul	MN	55101-2131
Koster	Chris	Missouri Attorney General's Office	Supreme Court Building	207 W. High Street	Jefferson City	MO	65101
Hood	Jim	Mississippi Attorney General's Office	Department of Justice	P.O. Box 220	Jackson	MS	39205
Fox	Tim	Office of the Montana Attorney General	Justice Bldg.	215 N. Sanders Street	Helena	MT	59620-1401
Cooper	Roy	Office of the North Carolina Attorney General	Department of Justice	P.O. Box 629	Raleigh	NC	27602-0629
Stenehjem	Wayne	North Dakota Office of the Attorney General	State Capitol	600 E. Boulevard Avenue	Bismarck	ND	58505-0040
Peterson	Doug	Office of the Nebraska Attorney General	State Capitol	P.O. Box 98920	Lincoln	NE	68509-8920
Foster	Joseph A.	New Hampshire Attorney General	State House Annex	33 Capitol Street	Concord	NH	03301-6397
Hoffman	John Jay	Office of the New Jersey Attorney General	Richard J. Hughes Justice Complex	25 Market Street, P.O. Box 080	Trenton	NJ	08625
Balderas	Hector	Office of the New Mexico Attorney General	P.O. Drawer 1508		Santa Fe	NM	87504-1508
Laxalt	Adam Paul	Nevada Attorney General	Old Supreme Ct. Bldg.	100 North Carson Street	Carson City	NV	89701
Schneiderman	Eric	Office of the New York Attorney General	Department of Law	The Capitol, 2nd Floor	Albany	NY	12224
DeWine	Mike	Ohio Attorney General	State Office Tower	30 E. Broad Street	Columbus	OH	43266-0410
Pruitt	Scott	Oklahoma Office of the Attorney General	313 NE 21st Street		Oklahoma City	OK	73105
Rosenblum	Ellen F.	Office of the Oregon Attorney General	Justice Building	1162 Court Street, NE	Salem	OR	97301
Kane	Kathleen	Pennsylvania Office of the Attorney General	1600 Strawberry Square		Harrisburg	PA	17120
Kilmartin	Peter	Rhode Island Office of the Attorney General	150 South Main Street		Providence	RI	02903
Wilson	Alan	South Carolina Attorney General	Rembert C. Dennis Office Bldg.	P.O. Box 11549	Columbia	SC	29211-1549
Jackley	Marty J.	South Dakota Office of the Attorney General	1302 East Highway 14, Suite 1		Pierre	SD	57501-8501
Slatery, III	Herbert H.	Tennessee Attorney General and Reporter	425 5th Avenue North		Nashville	TN	37243
Paxton	Ken	Attorney General of Texas	Capitol Station	P.O. Box 12548	Austin	TX	78711-2548
Reyes	Sean	Utah Office of the Attorney General	State Capitol, Room 236	350 N State St	Salt Lake City	UT	84114-0810
Herring	Mark	Office of the Virginia Attorney General	900 East Main Street		Richmond	VA	23219
Sorrell	William H.	Office of the Attorney General of Vermont	109 State Street		Montpelier	VT	05609-1001
Ferguson	Bob	Washington State Office of the Attorney General	1125 Washington St SE	P.O. Box 40100	Olympia	WA	98504-0100
Schimel	Brad	Office of the Wisconsin Attorney General	Dept of Justice, State Capitol, RM 114	East P.O. Box 7857	Madison	WI	53707-7857
Morrisey	Patrick	West Virginia Attorney General	State Capitol	1900 Kanawha Blvd E	Charleston	WV	25305
Michael	Peter K.	Office of the Wyoming Attorney General	State Capitol Bldg.	200 W 24th St	Cheyenne	WY	82002
Ale	Tatauega Eleasalo V.	American Samoa Attorney General	Exec. Ofc. Bldg. Utulei	Territory of American Samoa	Pago Pago	AS	96799
Barrett-Anderson	Elizabeth	Attorney General Office	590 S. Marine Corps Drive	ITC Bldg, Suite 706	Tamuning	Guam	96913
Manibusan	Edward	Northern Mariana Islands Attorney General	Administration Building	PO Box 10007	Saipan	MP	96950-8907
Miranda-Rodriguez	Cesar R.	Puerto Rico Attorney General	P.O. Box 902192	San Juan	San Juan	PR	00902-0192
Walker	Claude E.	Department of Justice	Virgin Islands Attorney General	34-38 Kronprindens Gade, GERS Bldg, 2nd Floor	St. Thomas	VI	00802
Flynn	Virginia B.	Troutman Sanders LLP	1001 Haxall Point		Richmond	VA	23218
Fuller	Chad R.	Troutman Sanders LLP	11682 El Camino Real	Suite 400	San Diego	CA	92130
Passarella	Patrick M.	KCC Class Action Services, LLC	3301 Kerner Blvd		San Rafael	CA	94901
Carameros	Jonathan D.	KCC Class Action Services, LLC	3301 Kerner Blvd		San Rafael	CA	94901

Exhibit B

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF CALIFORNIA

If You Received a Text Message or Call on Your Cellular Telephone from Price Self Storage Management, Inc., (“PSS”) You Could Get a Payment from a Class Action Settlement.

A Federal Court authorized this Notice. This is not a solicitation from a lawyer.

- A Settlement has been reached in a putative class action lawsuit about whether PSS sent text messages or placed calls to cellphone users after the users had said stop or replied “STOP” (other than a text message confirming the STOP request). PSS is referred to as the “Defendant.”
- Those included in the Settlement will be eligible to receive either a payment of up to \$750 or a certificate for \$1,100 in storage services (the actual amount, if any, of the payments will be based on the number of valid Claim Forms submitted, administrative costs, and any incentive award or attorneys’ fees and expenses approved by the Court).
- Please read this Notice carefully. Your legal rights are affected whether you act, or don’t act.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM FORM	This is the only way to receive a payment of up to \$750 or a certificate for up to \$1,100 in storage services (certificates must first be used to satisfy any outstanding balance).
EXCLUDE YOURSELF	You will receive no benefits, but you will retain any rights you currently have to sue the Defendant about the claims in this case.
OBJECT	Write to the Court explaining why you don’t like the Settlement.
GO TO THE HEARING	Ask to speak in Court about your opinion of the Settlement.
DO NOTHING	You won’t get a share of the Settlement benefits and will give up your rights to sue the Defendant about the claims in this case.

These rights and options – **and the deadlines to exercise them** – are explained in this Notice

BASIC INFORMATION

1. Why was this Notice issued?

A Court authorized this Notice because you have a right to know about a proposed Settlement of this class action lawsuit and about all of your options, before the Court decides whether to give final approval to the Settlement. This Notice explains the lawsuit, the Settlement, and your legal rights.

Judge Anthony J. Battaglia of the U.S. District Court for the Southern District of California is overseeing this case. The case is known as *Mendez v. Price Self Storage Management, Inc.* (“PSS”) 3:15-cv-02077-AJB-JLB. Mr. Mendez, the person who sued, is called the Plaintiff/Class Representative. The Defendant is PSS.

2. What is a Class Action?

In a class action, one or more named plaintiffs called Class Representatives (in this case, Eric Mendez) sue on behalf of a group or a “class” of people who have similar claims. In a class action, the court resolves the issues for all Class Members, except for those who exclude themselves from the Class.

3. What is this Lawsuit about?

This lawsuit alleges that PSS sent text messages to cellphones in violation of the Telephone Consumer Protection Act, 47 U.S.C. § 227. The Class Representative claims that PSS sent text messages to cellphone users who had responded “STOP” to prior messages, and that the subsequent messages went beyond merely confirming the STOP request. PSS denies that it violated any law and asserts several defenses.

The Court has not determined who is right. Rather, the Parties have agreed to settle the lawsuit to avoid the uncertainties and expenses associated with ongoing litigation.

4. Why is there a Settlement?

The Court has not decided whether the Plaintiffs or the Defendant should win this case. Instead, both sides agreed to a Settlement. That way, they avoid the uncertainties and expenses associated with ongoing litigation, and Class Members will get compensation now rather than, if at all, years from now.

WHO'S INCLUDED IN THE SETTLEMENT?**5. How do I know if I am in the Settlement Class?**

You are in the Settlement Class if:

- (a) you received at least one text message or call on your cellular telephone from PSS,
- (b) you responded to the text message with the response STOP or revoked consent orally, and
- (c) you received at least one additional text message from PSS apart from any message confirming the STOP request.

For the full definition of the Settlement Class, please see the Settlement Agreement, which is available by contacting the Settlement Administrator or Class Counsel.

THE SETTLEMENT BENEFITS**6. What does the Settlement provide?**

PSS has agreed to pay a collective Settlement Fund of up to \$450,000 U.S. dollars. The cost to send notice to the class and administer the Settlement as well as attorneys' fees and payments to the Class Representatives will come out of this amount (*see Question 13*). The amount remaining after deducting these costs will be used to pay the claims of eligible Class Members who submit valid claims up to the full amount of either \$750 in cash or a certificate of up to \$1,100 for storage services (which must first be used to satisfy any pending balance with PSS), and reduced *pro rata* if there are insufficient funds, based on the costs above and the number of claims, to make full payment. Class Members may make an election, by filling in the appropriate circle on the Claim Form, between the \$750 cash payment or the \$1,100 certificate for storage services from PSS. The certificate must be used to satisfy any balance the certificate holder owes to PSS. Certificates may be transferred one (1) time within the first sixty (60) days of issuance, and must be redeemed within ninety (90) days of issuance.

Protection from Future Unauthorized Messages: PSS has agreed to use commercially reasonable efforts to honor "STOP" requests when they are received.

Class Counsel has confirmed that such amounts are the maximum limit of such relief given Defendant's size and financial condition.

7. How much will my payment be?

If you are member of the Class and the Court gives final approval to the Settlement, you may be entitled to receive a check for up to \$750 or a certificate for up to \$1,100 in storage services. (The certificate must be used to satisfy any balance the certificate holder owes to PSS.) The amount of your exact payment cannot be calculated at this time. Your payment will depend on the total number of valid claims that are filed. The Class is estimated to include approximately 315 cellphone users. Though unlikely, your payment may be reduced if the amount required to pay in full all valid claims made by Settlement Class Members exceeds the amount available (after paying notice costs, the incentive award, and any approved attorneys' fees and expenses from the Settlement Fund), then each Class Member who filed a valid claim shall receive a reduced share of that Settlement Fund.

You may only make one claim per cellphone number, regardless of how many calls were received.

8. When will I get my payment?

You should receive a check or certificate, depending on your election, from the Settlement Administrator within 60-90 days after the Settlement has been finally approved and/or after any appeals have been resolved in favor of the Settlement. The hearing to consider the final fairness of the Settlement is scheduled for August 22, 2016. All checks will expire and become void 90 days after they are issued. The certificates must be used to satisfy any balance the certificate holder owes to PSS. Certificates may be transferred one (1) time within the first sixty (60) days of issuance, and must be redeemed within ninety (90) days of issuance.

HOW TO GET BENEFITS**9. How do I get benefits?**

If you are a Class Member and you want to participate in the Settlement, you must complete and submit a Claim Form, under penalty of perjury, by **September 21, 2016**. The Claim Form is included with this Notice and can be found by calling, toll free, 1-866-542-0370 or by contacting Class Counsel at (720) 213-0675. The Claim Form can be submitted online at the website, www.PriceStoreTCPAClaim.com, or by mail. There is only one claim per cellphone number.

REMAINING IN THE SETTLEMENT

10. What am I giving up if I stay in the Class?

If the Settlement becomes final, you will give up your right to sue PSS for the claims being resolved by this Settlement. The specific claims you are giving up against PSS are described in Section 1.30 of the Settlement Agreement. You will be “releasing” the Defendant and all related people as described in Section 1.3 of the Settlement Agreement. Unless you exclude yourself (*see Question 14*), you are “releasing” the claims, regardless of whether you submit a claim or not. The Settlement Agreement is available at www.PriceStoreTCPAClaim.com.

The Settlement Agreement describes the released claims with specific descriptions, so read it carefully. If you have any questions you can talk to Class Counsel listed in Questions 12 and 17 for free or you can, of course, talk to your own lawyer if you have questions about what this means.

11. What happens if I do nothing at all?

If you do nothing, you won’t get any benefits from this Settlement. But, unless you exclude yourself, you won’t be able to start a lawsuit or be part of any other lawsuit against the Defendant for the claims being resolved by this Settlement.

THE LAWYERS REPRESENTING YOU

12. Do I have a lawyer in the case?

The Court has appointed Steven Woodrow and Patrick Peluso of Woodrow & Peluso, LLC, and Stefan Coleman of the Law Office of Stefan Coleman, to be the attorneys representing the Settlement Class. They are called “Class Counsel.” They believe, after conducting an extensive investigation, that the Settlement Agreement is fair, reasonable, and in the best interests of the Settlement Class. You will not be charged for these lawyers. If you want to be represented by your own lawyer in this case, you may hire one at your expense. You may also enter an appearance though an attorney if you so desire.

13. How will the lawyers be paid?

Subject to Court approval, Defendants have agreed to pay Class Counsel up to \$100,000 representing 22.22% of the Settlement Fund for attorneys’ fees and expenses for investigating the facts, litigating the case, and negotiating the Settlement in this matter. The Court may award less than this amount. Under the Settlement Agreement, any amount awarded to Class Counsel will be paid out of the Settlement Fund.

Subject to approval by the Court, Defendants have agreed to pay \$3,000 to the Class Representative from the Settlement Fund as an incentive award for his services in helping to litigate and settle this case.

EXCLUDING YOURSELF FROM THE SETTLEMENT

14. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must send a letter (or request for exclusion) by mail stating that you want to be excluded from *Mendez v. Price Self Storage Management, Inc.* 3:15-cv-02077-AJB-JLB. Your letter or request for exclusion must also include your name, your address, the phone number that received the relevant cellphone calls, and your signature. You must mail your exclusion request so that it is postmarked no later than July 14, 2016 to:

Mendez v. Price Self Storage Management, Inc. Settlement Administrator
3:15-cv-02077-AJB-JLB
P.O. Box 40007
College Station, TX 77842-4007
1-866-542-0370

The Court will exclude from the Class any Class Member who timely requests exclusion.

15. If I don’t exclude myself, can I sue the Defendant for the same thing later?

No. Unless you exclude yourself, you give up any right to sue PSS for the claims being resolved by this Settlement.

16. If I exclude myself, can I get anything from this Settlement?

No. If you exclude yourself, do not submit a Claim Form to ask for benefits.

OBJECTING TO THE SETTLEMENT

17. How do I object to the Settlement?

If you’re a Class Member, you can object to the Settlement if you don’t like any part of it. You can give reasons why you think the Court should not approve it. The Court will consider your views. To object, you must send a letter stating that you object to the Settlement in *Mendez v. Price Self Storage Management, Inc.* 3:15-cv-02077-AJB-JLB, and identify all your reasons for your objections (including citations and supporting evidence) and attach any materials you rely on for your objections. Your letter or brief must also include your name, your address, your cellular telephone number that received the unauthorized telephone call(s), and your signature.

CALL 1-866-542-0370 FOR THE SETTLEMENT ADMINISTRATOR OR (720) 213-0675 FOR CLASS COUNSEL

OR GO TO WWW.PRICESTORETCPACLAIM.COM

Class Counsel will file with the Court and post on its website, www.woodrowpeluso.com, its request for attorneys' fees two weeks prior to the objection deadline.

If you want to appear and speak at the Fairness Hearing to object to the Settlement, with or without a lawyer (explained below in answer to Question Number 21), you must say so in your letter or brief. Mail the objection to these four different places postmarked no later than **July 14, 2016**:

Court	Class Counsel	Defense Counsel	Settlement Administrator
The Honorable Anthony J. Battaglia c/o Clerk of the Court US Courthouse 333 West Broadway Suite 420 San Diego, CA 92101	Steven Woodrow, Esq. Class Counsel Woodrow & Peluso, LLC 3900 East Mexico Ave. Ste. 300 Denver, CO 80210 (720) 213-0675	Chad R. Fuller and Virginia Flynn TROUTMAN SANDERS LLP 11682 El Camino Real Suite 400 San Diego, CA 92130-2092	<i>Mendez v. Price Self Storage Management, Inc.</i> Settlement Administrator P.O. Box 40007 College Station, TX 77842-4007

18. What's the difference between objecting and excluding myself from the Settlement?

Objecting simply means telling the Court that you don't like something about the Settlement. You can object only if you stay in the Class. Excluding yourself from the Class is telling the Court that you don't want to be part of the Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

THE COURT'S FAIRNESS HEARING

19. When and where will the Court decide whether to approve the Settlement?

The Court will hold the Fairness Hearing at 3:00 p.m. on **August 22, 2016** in Courtroom 3B (3rd Floor - Schwartz), at the United States Courthouse located at 221 West Broadway, Suite 3142, San Diego, CA 92101. The purpose of the hearing will be for the Court to determine whether to approve the Settlement as fair, reasonable, adequate, and in the best interests of the Class; to consider the Parties' agreement that Class Counsel should be paid 22.22% of the Settlement Funds for attorneys' fees and expenses; and to consider the request for an incentive award to Class Representative in the amount of \$3,000. At that hearing, the Court will be available to hear any objections and arguments concerning the fairness of the Settlement.

The hearing may be postponed to a different date or time without notice, so it is a good idea to check with Class Counsel by calling (720) 213-0675. If, however, you timely object to the Settlement and advise the Court that you intend to appear and speak at the Fairness Hearing, you will receive notice of any change in the date of such Fairness Hearing.

20. Do I have to come to the hearing?

No. Class Counsel will answer any questions the Court may have. But you are welcome to come at your own expense. If you send an objection or comment, you don't have to come to Court to talk about it. As long as you mailed your written objection on time, the Court will consider it. You may also pay another lawyer to attend, but it's not required.

21. May I speak at the hearing?

Yes. You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must send a letter saying that it is your "Notice of Intent to Appear in *Mendez v. Price Self Storage Management, Inc.* 3:15-cv-02077-AJB-JLB." It must include your name, address, telephone number and signature as well as the name and address of your lawyer, if one is appearing for you. Your Notice of Intent to Appear must be postmarked no later than **July 14, 2016**, and be sent to the addresses listed in Question 17. You must also state in your objection that you plan on appearing at the hearing.

GETTING MORE INFORMATION

22. Where do I get more information?

This Notice summarizes the Settlement. More details are in the full Settlement Agreement. You can get a copy of the Settlement Agreement by writing the Settlement Administrator at *Mendez v. Price Self Storage Management, Inc.* Settlement Administrator, P.O. Box 40007, College Station, TX 77842-4007. You can call the Settlement Administrator at 1-866-542-0370 or Class Counsel at (720) 213-0675, if you have any questions. Before doing so, however, please read this full Notice carefully. More information on the Settlement is also available at www.PriceStoreTCPAClaim.com.

Cell Phone Number at the Time you Received a/the Call(s)/Text(s):

Current Phone Number (Please provide a phone number where you can be reached if further information is required.)

(Please provide a phone number where you can be reached if further information is required.)

Election of Benefit

Fill in the one circle that applies (you may NOT elect both benefits):

- I would like to receive a check for up to \$750. Note: If you fill in this circle, please complete the Substitute IRS Form W-9 below. If you do not, the law requires us to backup withhold on any payments to you over \$600. The backup withholding rate is 28% on taxable non-wage income. If your name has changed, we require that you provide us with proof of your name change. Please also complete the Class Member Verification section after the Substitute W-9 Form.
- I would like to receive a certificate for up to \$1,100 in storage services at PSS (certificate value must first be used towards any outstanding balance). You do NOT need to complete the Substitute IRS Form W-9 below if you choose the certificate. Please continue on and complete the Class Member Verification Section that appears after the Substitute W-9 Form.

Substitute W-9 Form Taxpayer Identification Number Certification

Enter your Social Security Number: _____

Print name and address as shown on your income tax return:

First Name: _____ Last Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Under penalties of perjury, I certify that:

1. The taxpayer identification number shown on this form is my correct taxpayer identification number, **and**
2. I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding, **and**
3. I am a U.S. person (including a U.S. resident alien). Note: If you have been notified by the IRS that you are subject to backup withholding, you must cross out item 2 above.

The Internal Revenue Service does not require your consent to any provision of this document other than the certifications required to avoid backup withholding.

Class Member Verification

By submitting this claim form and filling in the circle below, I declare under penalty of perjury that I am a member of the Class and that the following statement is true:

- I received at least one text message or call on my cellular telephone from PSS, responded to the text message with the response STOP or said STOP verbally, and I received at least one additional text message or call from PSS apart from any message confirming my STOP request.

Additional information regarding the Settlement can be found at www.PriceStoreTCPAClaim.com.

The Settlement Administrator may audit any and all claims. **I declare under penalty of perjury that the foregoing is true and correct.**

Signature: _____

Dated (mm/dd/yyyy): _____

Print Name: _____

Your claim will be reviewed by the Settlement Administrator. If accepted you will be mailed a check for \$750 or a certificate for \$1,100 (or a lesser *pro rata* share). Please be patient.

CLAIM FORMS MUST BE SUBMITTED ONLINE OR POSTMARKED NO LATER THAN SEPTEMBER 21, 2016 TO BE ELIGIBLE FOR PAYMENT. MAIL THIS CLAIM FORM TO:

Mendez v. Price Self Storage Management, Inc. Settlement Administrator
P.O. Box 40007, College Station, TX 77842-4007

If you have questions, you may call the Settlement Administrator at 1-866-542-0370 or Class Counsel at (720) 213-0675.

